



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 14, 2024

BY ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Maritime Legal Solutions v. U.S. Transp. Command*, No. 23 Civ. 7045 (KPF)

Dear Judge Failla:

This Office represents defendant the United States Transportation Command in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). I write respectfully, together with the plaintiff, to request that the initial pretrial conference presently scheduled for February 22, 2024 (Dkt. No. 16) be rescheduled to the week of March 25, 2024, or a time thereafter that is convenient for the Court, with a corresponding extension of time for the parties’ preconference submissions, currently due February 15.

This is the third request by either party to adjourn the conference; the Court granted the two prior requests. Defendant previously made a production of documents in response to the FOIA request. After consultation with plaintiff’s counsel, Defendant is exploring whether additional documents may be released and will be preparing a *Vaughn* index. In the interest of efficiency, the requested adjournment will allow the parties to continue their discussion regarding plaintiff’s concerns with the production and to confer regarding next steps in advance of appearing before the Court. The parties thank the Court for its consideration of this letter.

Respectfully submitted,

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Southern District of New York
Attorney for Defendant

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cc: *Counsel of record* (by ECF)